

*W. D. Crenshaw, Jr.*  
US DISTRICT JUDGE

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA	)	
	)	NO. 3:25-cv-00191
v.	)	
	)	JUDGE CRENSHAW
BRIAN KELSEY	)	

**MOTION FOR ADDITIONAL TIME TO RESPOND TO KELSEY’S  
PETITION UNDER 28 U.S.C. § 2255**

The United States of America, by and through its undersigned attorneys, files this request for a continuance of 30 days to respond to Kelsey’s Motion to Vacate Conviction Pursuant to 28 U.S.C. § 2255. In support of such motion, the United States submits the following:

1. On January 23, 2025, Petitioner Brian Kelsey filed a *Motion to Vacate Conviction Pursuant to 28 U.S.C. § 2255* (Case No. 3:21-cr-00264, Doc. No. 200) and an accompanying *Memorandum of Law* (Case No. 3:21-cr-00264, Doc. No. 201). He also filed a Motion for Leave to File Excess Pages, explaining that his memorandum “brings several substantial reasons for vacating Mr. Kelsey’s conviction, each of which require a complete explanation and legal support.” (Case No. 3:21-cr-00264, Doc. No. 199.) On February 20, 2025, all the documents related to the *Motion to Vacate Conviction Pursuant to 28 U.S.C. § 2255* were docketed under this civil case number. (See Doc. No. 1 through 6).

2. Together, this briefing amounts to nearly 75 pages of legal argument. The accompanying exhibits number 385 pages, plus two audio recordings, one of which is over an hour and a half long.